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**VIA ECF**

March 11, 2024

Hon. Lara K. Eshkenazi  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Rosetta Jaisingh v. Synchrony Bank*, 1:24-cv-05595-CBA-LKE (EDNY)  
Request for Referral to Mediation and for Extension of Discovery Deadlines**

Dear Judge Eshkenazi:

CAMBA Legal Services, Inc., represents Plaintiff Rosetta Jaisingh in this action. We write with the consent of counsel for Synchrony Bank to: 1) request a referral to this court's mediation program and 2) request a 6-week extension of the remaining discovery deadlines in this case. This is the parties' first request for an extension of the discovery deadlines, though they previously requested an extension of the deadlines relating to settlement and amending the pleadings.

Your Honor entered a Scheduling Order on November 19, 2024 [ECF No. 13], and extended the deadlines by short order dated February 13, 2025. The parties served discovery demands in December, and Plaintiff has made a settlement demand and on March 3 served her responses to Defendant's discovery requests. Defendant is still working to collect responsive documents and has requested, and Plaintiff has granted, an extension of time to serve its own discovery responses to March 19. Defendant's deadline to make a settlement offer is March 17, and it does not seek an extension of that deadline.

The remaining deadlines for which the parties request a 6-week extension are as follows:

- Motion to amend pleadings: 3/27/25
- Close of fact discovery: 4/28/2025
- Affirmative expert reports: 5/21/25
- Rebuttal expert reports: 6/18/25
- Expert depositions: 7/16/25
- Completion of all discovery and status report: 7/23/25

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- Dispositive motions or joint pretrial order: 8/13/25

The parties would like to explore resolution of this matter and accordingly request a referral to this Court's Mediation program so that we can begin the process of securing a mediator and scheduling a mediation session.

However, in order for mediation to be fruitful, the parties believe an exchange of documents is necessary. Plaintiff has served her discovery responses, and a 6-week extension would provide time for Defendant to produce its documents, and for both parties to review each other's productions, prepare for and pursue mediation, and conduct depositions and follow-up paper discovery, without unduly prolonging this case.

We thank you for your consideration of this request.

Best,

*/s/ Divya Subrahmanyam*